

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

Susan Pearson-Ahlborg
19 Williams St
Lincoln, RI 02865

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Commission of Judicial Tenure
and Discipline; Glenn Sparr, Esq;
Alan B. Feinstein; Peter Kilmarin

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

JSC
Attached

2017 MAR 29 A 3:17
Complaint for a Civil Case

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: Yes No
(check one)

CA17- 123M

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Susan Pearson-Ahlborg</u>
Street Address	<u>19 Williams St.</u>
City and County	<u>Lincoln</u>
State and Zip Code	<u>RI 02865</u>
Telephone Number	<u>401-787-3321</u>
E-mail Address	_____

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Commission of Judicial Tenure and Discipline</u>
Job or Title (if known)	<u>250 Benefit St.</u>
Street Address	<u>Providence</u>
City and County	<u>RI 02903</u>
State and Zip Code	<u>401-222-1493</u>
Telephone Number	_____
E-mail Address (if known)	_____

Defendant No. 2

Name	<u>Peter Kilmartin, Esq.</u>
Job or Title (if known)	<u>Acting Attorney General</u>
Street Address	<u>150 S. Main St.</u>
City and County	<u>Providence, RI</u>

State and Zip Code

Rhode Island, 02903

Telephone Number

401-272-4400

E-mail Address

(if known)

Defendant No. 3

Name

Glenn Sparr, Esq

Job or Title

Attorney

(if known)

Street Address

293 South Main St. H

City and County

Providence

State and Zip Code

Rhode Island, 02903

Telephone Number

401-521-9100

E-mail Address

(if known)

Defendant No. 4

Name

Alan B. Feinstein

Job or Title

Former R.I. employee

(if known)

Street Address

24 Salt Pond Rd.

City and County

Wakefield

State and Zip Code

Rhode Island, 02879

Telephone Number

401-524-2020

E-mail Address

(if known)

abfpsych@yahoo.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

State and Zip Code _____

Telephone Number _____

E-mail Address _____

(if known)

Defendant No. 3 5

Name Maryann Keough, Esq.

Job or Title Assistant A.G.

(if known)

Street Address 45 Washington Square

City and County Newport

State and Zip Code R.I. - 02840

Telephone Number 401-274-4400

E-mail Address _____

(if known)

Defendant No. 4

Name _____

Job or Title _____

(if known)

Street Address _____

City and County _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*check all that apply*)

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

US-42; 18; 8
Violation of civil rights ; Fraud

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The claim is for damages due to the Plaintiff, by the Defendants actions; lack of, The Commission of Judicial Tenure and Discipline, - was involved to stop A Judge who was represented by the attorney

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

The Plaintiff asks this court to order \$6,000,000.00 in damages from the Defendants for violating the Plaintiff's Civil Rights and Fraud. The claim for damages is due to diagnosis, that is still ongoing. The Plaintiff asks this court to order Punitive Damages for \$600,000.00 due to the ongoing diagnosis.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

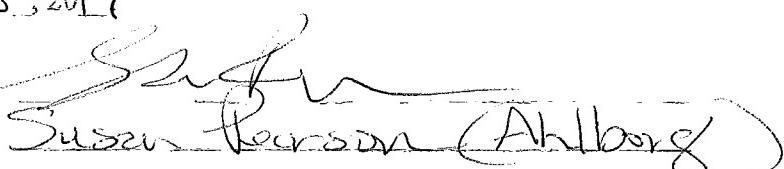
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-28, 2017

Signature of Plaintiff

Printed Name of Plaintiff



B. For Attorneys

Date of signing: _____, 20 ____.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____

CONTINUATION PAGES

The Defendant(s) - Continuation

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 5

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 6

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____

Defendant No. 7

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known) _____

Defendant No. 8

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____

Statement of Claim - Continuation

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

General's office of RI. The Commission of
Judicial Tenure and Discipline had a
responsibility and obligation to no longer
allow Judge Walter Stone to continue
in an ongoing case with the Plaintiff
as going forward, certainly would have
been unethical and lawfull, as it
certainly was prejudiced and a bias
situation. The Commission of Judicial
Tenure and discipline, knew at the
time of complaint entered, Judge
Walter Stone was being represented by
"two attorneys" from the Attorney
General's office. The Commission did
not "remove" Judge Walter Stone off

Defendant No. 8

Name _____
Job or Title _____
(if known) _____
Street Address _____
City and County _____

Statement of Claim - Continuation

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

the case, he was overseeing, And
then sent a letter, over months
later, stating they found "nothing
unethical, or wrong about this."
The Plaintiff is entitled to the damages
stated, as the Commission failed to
due their duties. This was a violation
of the Plaintiff's Civil Rights, and
occurred at Kent County, Warwick, RI
* the claim is: Violation of Civil Rights
during the dates of January 2014 through
May 2014. - Violation of Civil Rights
* Glenn Spurr, Esq - did knowingly commit
fraud - or reckless fraud by having the
Plaintiff meet with Alan B. Feinstein,
whom was represented in court,

AS Mr. Feinstein being an M.D.
There was never a Licence for
Mr. Feinstein issued by the RI
Dept. of Health, ever. This claim of
Fraud occurs at kent County,
~~AS A M.D. - (Only EMT).~~

Worralk, RI, during the dates of
February 2014, through May 2014.
The harm caused by the Defendant
was severe emotional harm to

damages, and the damages are still
ongoing and the Plaintiff is entitled
to the damages.

* Alan B Feinstein, told this Plaintiff he
was a Licensed M.D, even presenting
(The claim is FRAUD)
a business card. The Defendant had
been paid \$2500.00 by Judge Walter
Stone, with the State of Rhode
Islands - tax paying money. Alan
Feinstein accepted this money, knowing
Judge Walter Stone was represented
at the time by Attorney General's
Office. Alan B Feinstein falsely
represented himself as being a
doctor of psychiatry or having
any Medical license in the State of
Rhode Island. He falsely accepts
money from the State of RI. A
situation created by Judge Walter Stone.
- The Claim is Fraud - Mr. Feinstein

acknowledges he had been paid - and payment had come from Judge Walter Stone. Mr. Feinstein then wrote a report to accommodate Judge Walter Stone that states him to be his defense in the Civil Matter he was represented in by the Attorney General's Office. Mr. Feinstein knew this.

This occurs, and kept occurring from February 2014, through May 2014. Kent County; Warwick, RI.
The claim is fraud. In fact
the Plaintiff is entitled to damages
due to damages, harm and
ongoing harm. Due to the report Mr.
Feinstein provided to Judge Walter Stone,
I was subject to being sentenced,
because a real "Licenser doctor",
certainly did not go along with the
"false report". Mr. Feinstein had
written and prepared for the court
for Judge Walter Stone. In fact,
no other Licenser MD would have
put together a report of such nature,
been paid by a Judge, and submitted
the way it was done, to a Court.
Mr. Feinstein also failed to tell this
Plaintiff he was a state employee.
Plaintiff is entitled to the damages.

* Peter Kilmartin Esq.
* The claim is Violation of Civil Rights
that occurred from February 2014,
through May 2014, at Kent County, Warwick
The Plaintiff's damages are due to
the Violation of Civil Rights as a
result of the Defendants representing
a Judge at the time of sentencing
for his client; And knowing his
client, Judge Walter Stone, was
desiring the Plaintiff an attorney
to defend her. The Defendant, Peter
Kilmartin, representing his "client"
Judge Walter Stone, did not take the
necessary lawful steps, avoiding the
Plaintiff harm, by continuing to
allow his client to proceed in a
court of law. The Defendant,
actually made his appearance, on
behalf of his client, Judge Walter
Stone at a hearing on May 14, 2014,
knowing and not taking action
that his "client" was "preventing
the Plaintiff to having Counsel present."
Mr. Kilmartin caused the damage to
this Plaintiff by witnessing what
his client was doing. Mr. Kilmartin
did not take the legal and necessary
steps in avoiding the Violation of the
Plaintiff's Civil Rights. The damages
are entitled to the Plaintiff.

The harm for damages are, The claim - Again is for Violation of Civil Rights. Knowingly restricting this Plaintiff from counsel in a Superior Court. The Damages are harm, and are still ongoing.

* Maureen Keough, Esq

* The claim is Violation of Civil

Rights to the Plaintiff.

Occurring in Kent County, Warrick

KT during the dates from February 2014, through May 2014.

The Defendant was very aware

her attorney general's office was representing the Judge, Judge

Walter Stere, on a Civil matter.

The Defendant condoned the

Judge - her "Client" for taking

Taxpayers money - State money -

and using it to advance

her case with this Plaintiff.

The Defendant was vehemently

gratified numerous times,

while the Plaintiff was "Denied"

Counsel to Be present at the

Court hearings - and continued the

proceedings with insults. Violating

The Plaintiff's Civil Rights.

Repeatedly - The claim - Violation of Civil Rights

Damages for the harm created by

The damages of harm are entitled to the Plaintiff.